

SEALED

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURTUnited States Courts
Southern District of Texas
FILEDfor the
Southern District of Texas**MAR 8 2019**

David J. Bradley, Clerk of Court

United States of America

v.

Lance ESSWEIN

Case No.

2:19mj 958

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

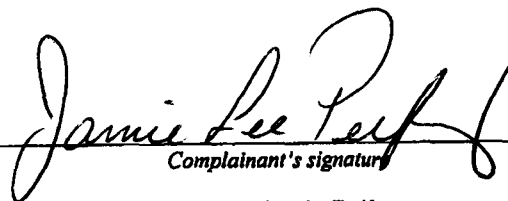
On or about the date(s) of February 28, 2019 in the county of San Patricio in the
Southern District of Texas, the defendant(s) violated:*Code Section*

21 USC 841, 846

*Offense Description*did knowingly and intentionally possess with intent to distribute a Schedule I
Controlled Substance; to wit Methamphetamine;

This criminal complaint is based on these facts:

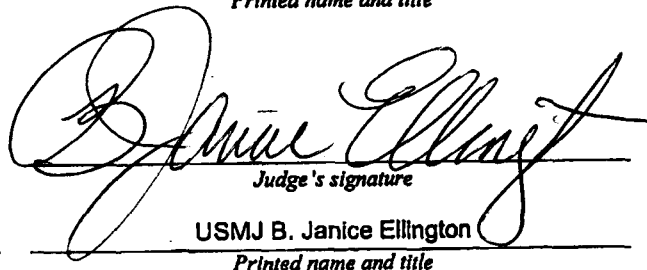
See Attached Affidavit

☒ Continued on the attached sheet.
Complainant's signature

HSI TFO Jamie Pelfrey

Printed name and title

Sworn to before me and signed in my presence.

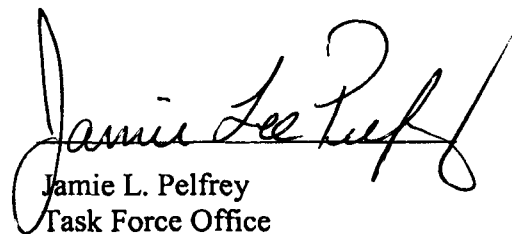
Date: March 8, 2019City and state: Corpus Christi, Texas
Judge's signature

USMJ B. Janice Ellington

Printed name and title

AFFIDAVIT

1. I, Pelfrey Jamie is currently a Detective with the Corpus Christi Police Department and a Task Force Officer (TFO) with the United States Department of Homeland Security Investigations (HSI). Your affiant has been a commissioned police officer since 01-2001 and currently hold a masters peace officers license with the State of Texas. Your affiant has been assigned as a TFO since 09-2018. Your affiant currently works in an undercover capacity investigating narcotics and sexually oriented offenses. Your affiant investigates criminal violations relating to offenses committed against the United States and the State of Texas including but not limited to Transnational Gang Organizations involved in controlled substance violations, sexually oriented crimes, and money laundering. Your affiant has worked closely with other law enforcement agents and officers who have engaged in numerous investigations involving illegal transnational gang activity, narcotic violations, vice related offenses including prostitution and human trafficking. Your affiant has attended numerous courses and continuous training involving the performance of his current assignment and duties.
2. Department of Homeland Security Investigation (HSI) Agents and your affiant obtained information that Lance ESSWEIN, a retired Naval Commander, was distributing large amounts of methamphetamine in the Coastal Bend area. Your affiant developed a source of information (SOI 1) who is a member of Lance ESSWEIN drug trafficking organization. The information he has provided has been corroborated through phone calls, text messages, and other sources of information identified during the investigation. On 02/28/2019, SOI 1 arranged a purchase of methamphetamine from Lance ESSWEIN under the direction of your affiant. SOI 1 purchased methamphetamine from Lance ESSWEIN under constant supervision and policies pertaining to a controlled delivery of HSI and your affiant. HSI provided the US Currency for the purchase of the methamphetamine. Lance ESSWEIN was observed by Agents (HSI) and Officers with the Department of Public Safety (DPS) leaving from his residence directly to SOI 1. During the controlled delivery, SOI 1 purchased approximately 118 grams of methamphetamine which was observed by your affiant. Your affiant processed, and field tested the methamphetamine which indicated a positive test.


Jamie L. Pelfrey
Task Force Office

Homeland Security Investigations (HSI)

SWORN TO AND BEFORE ME
THIS 8TH DAY OF MARCH 2019


B. Janice Ellington, United States Magistrate Judge